

June 11, 2004

VIA HAND DELIVERY

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, Second Floor
Boston, MA 02110

Re: *NSTAR Electric*, D.T.E. 03-121

Dear Secretary Cottrell:

Western Massachusetts Electric Company (“WMECO”) appreciates the opportunity to comment on the Offer of Settlement submitted to the Department of Telecommunications and Energy on June 4, 2004 in the above-referenced proceeding by Boston Edison Company, Cambridge Electric Light Company, and Commonwealth Electric Company (together “NSTAR Electric”), the Division of Energy Resources, Associated Industries of Massachusetts, Conservation Law Foundation, Solar Business Association of New England, and the Joint Supporters (composed of the following: Boston Public Schools; Co-Energy America, Inc.; National Association of Energy Service Companies; Inc.; Siemens Building Technologies, Inc.; District One; The E Cubed Company, L.L.C.; Predicate LLC; Energy Concepts Engineering, PC; Dgsolutions LLC; and Pace Law School Energy Project). The settling parties should be commended for their efforts to resolve this proceeding cooperatively.

WMECO has no objection to the Offer of Settlement in this proceeding establishing standby rates for NSTAR Electric. WMECO submitted the pre-filed testimony of Edward A. Davis, Manager of Pricing Strategy and Administration for Northeast Utilities in support of standby rates. Exh. WM-EAD-1. In addition, WMECO joined in supporting the testimony of Dr. Hethie S. Parmesano. Exh. NSTAR-HSP-1. Dr. Parmesano further explained the rationale for standby rates. The Offer of Settlement appears to implement appropriately standby rates for the NSTAR Electric system.

WMECO wishes only to add that there are a few portions of the tariff language submitted with the Offer of Settlement that are not clear. These portions are not central

to the settlement, but WMECO believes clarification would assist all parties in the future application of the tariffs. In Boston Edison Company's Rate SB-3¹ these provisions are as follows:

(1) In paragraph 5 in the Availability section (page 1 of 6), it would be helpful to have additional explanation on the operation of the mechanism in subsection (b), the 10,000 kW threshold for fuel cells operating on natural gas, and several examples to illustrate that operation.

(2) In the Non-Firm Service section (page 6 of 6), it appears that a customer's non-firm load would be served only when local distribution capacity is available. It also appears that for a customer designating as non-firm all its internal load served by on-site generation, that customer would be subject to the otherwise applicable rate in all respects. Any comment on the above and examples of how the rate would operate if the customer took a combination of firm and non-firm service would be helpful.

(3) In the Customer-Nominated Contract Demand section (page 6 of 6), several elements that a special contract may contain are listed. It would be helpful to understand to the meaning of the listed phrase "an adjusted demand rate to reflect levelized demand month to month with no deviation from contract demand."

Thank you.

Very truly yours,

Stephen Klionsky

cc: Service List

¹ The Boston Edison Company tariff is used for ease of reference. The comments apply equally to Cambridge Electric Light Company and Commonwealth Electric Company tariffs.